

1 Defendant Nancy A. Berryhill, Acting Commissioner of the Social Security Administration
2 (“Defendant”) respectfully request the Court to extend the time for Defendant to file her response to
3 Plaintiff’s Motion For Summary Judgment and Memorandum of Points and Authorities, due on
4 December 20, 2017, by 45 days, through and including February 5, 2018 (the 45th day falls on
5 Saturday, February 3).
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7 Pursuant to Civil L.R. 6-2, the undersigned states the following:

8 (1) An extension of time is needed as Defendant’s counsel is in the process of contacting his
9 client, the Office of Hearing Operations (OHO) for the purposes of seeking settlement authority in this
10 case.
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12 (2) The undersigned is requesting a 45-day extension to insure the necessary time for
13 discussion with OHO, and for them to provide a response within the next 30 days. Further the
14 undersigned has 10 other district court briefs due in January.
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16 (3) Finally, the respective counsels will need additional time to negotiate the terms of any
17 settlement.
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19 (3) Plaintiff’s Reply brief, if necessary will be due on February 20, 2018.

20 (4) Pursuant to the Court’s scheduling order (ECF Doc. #4), the matter will be submitted for
21 decision without oral argument, thus an extension of time will not require vacating a hearing date.
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23 (5) Counsel for Defendant conferred with Plaintiff’s counsel by email, who has no opposition to
24 the requested extension on December 13, 2017.
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1 (6) This request is made in good faith with no intention to unduly delay the proceedings.
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3 Respectfully submitted,
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5 BRIAN J. STRETCH
6 United States Attorney

7 Dated: December 14, 2017

8 By: /s/Richard M. Rodriguez
9 RICHARD M. RODRIGUEZ
10 Special Assistant United States Attorney
11 Attorney for Defendant

12 Dated: December 14, 2017

13 /s/Jared T. Walker
14 JARED T. WALKER, CSBN 269029
15 Attorney for Plaintiff*
16 By Richard M. Rodriguez
17 (*email authorization on December 13, 2017)

18 PURSUANT OT STIPULATION, IT IS SO ORDERED.
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20 Dated: 12/19/17
21

22 Kandis Westmore
23 Hon. KANDIS WESTMORE
24 United States Magistrate Judge
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